

RECEIVED

DOCKET FILE COPY ORIGINAL

October 28, 1993

OCT 28 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BY MESSENGER

Ms. Donna Searcy
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, D.C. 20054

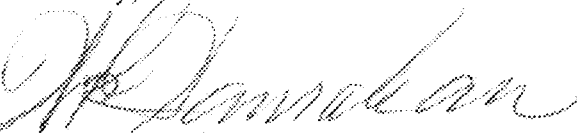
Re: General Docket No. 92-152/FCC 93-421

Dear Ms. Searcy:

Enclosed please find the original and six (6) copies of the comments of the Computer and Business Equipment Manufacturers Association on the above referenced matter.

Should there be any questions regarding this filing, please feel free to contact to contact the undersigned.

Sincerely,



William F. Hanrahan
Senior Director

Phone: 202-626-5733

Fax: 202-638-4922

cc: Dr. Thomas P. Stanley
Richard B. Engleman
John A. Reed
Julius Knapp
L. Art Wall

No. of Copies rec'd
List ABCDE

046

C B E M A

RECEIVED

October 27, 1993

DOCKET FILE COPY ORIGINAL

OCT 28 1993

To: The Federal Communications Commission

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: General Docket 92-152/FCC 93-421, Harmonization of Digital Device Standards with
International Standards

The Computer and Business Equipment Manufacturers Association (CBEMA) wholeheartedly endorses the action of the Commission, as announced in the October 1, 1993 *Federal Register*, to revise the technical standards for digital devices to permit manufacturers of these devices to demonstrate compliance with either the FCC requirements or the international standards for radio frequency (rf) emissions. As noted in the *Federal Register* notice of final rule action, the international standards were developed by the International Special Committee on Radio Interference (CISPR) and are used in many other countries. Harmonization of the standards will permit products manufactured for sale within the U.S. to be marketed to those countries following the CISPR specifications with minimal additional testing and product design modifications.

CBEMA represents the leading companies providing computer, business equipment and telecommunications hardware, software and services to strengthen the industry in the U.S. with emphasis on improving the global competitiveness of U.S.-owned industry.

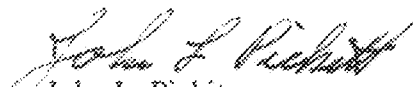
CBEMA has been involved for more than fifteen years in the development of limits for measuring radio frequency emissions from computing devices. CBEMA has actively participated -- indeed, in many cases been among the leaders -- in these activities, from the initial proposals to regulate the emanation characteristics of computers in Docket 20780, through the Part 15 Rewrite and adoption of the ANSI C63.4 measurement standards.

CBEMA's member companies have also been actively represented in the international standards making bodies, and in the subcommittees and working groups that advise both the national and international committees responsible for setting the recommended standards, including the CISPR working groups and committees that have developed CISPR 22, Limits and Methods of Measurement of Radio Interference Characteristics of Information Technology Equipment. CBEMA members' efforts to achieve an international standard through CISPR originated nearly twenty years ago, almost simultaneously with the Commission's own efforts in Docket 20780.

CBEMA appreciates very much the work the FCC has been doing in this area. It represents a major step toward harmonization of FCC specifications with international standards, a key objective of CBEMA. As a further step towards more complete harmonization, we would strongly urge the FCC to propose, through the U.S. National Committee for the IEC, the CISPR parent Committee, that the FCC limits above one Gigahertz (Ghz) be included in CISPR 22.

CBEMA commends the Commission for its action to revise the technical standards for digital devices to permit manufacturers of these devices to demonstrate compliance with either the FCC requirements or the international standards for radio frequency (rf) emissions.

Respectfully submitted,


John L. Pickitt
President

JLP/wfh

C B E M A